

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT PARKERSBURG**

**CONN FEAMSTER and  
SANDRA FEAMSTER,**

**Plaintiffs,**

**v.**

**CIVIL ACTION NO. 6:10-CV-00241  
The Honorable Joseph R. Goodwin**

**HIGHMARK WEST VIRGINIA INC. d/b/a  
MOUNTAIN STATE BLUE CROSS BLUE  
SHIELD, and RELATIONAL MANAGEMENT  
SERVICES, LLC,**

**Defendants.**

**PLAINTIFFS' RULE 26(a)(1) DISCLOSURES**

Plaintiffs Conn Feamster and Sandra Feamster ("the Plaintiffs"), by counsel, hereby make the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and the Order and Notice entered by the Court:

- (A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:
1. Plaintiff Conn Feamster.
  2. Plaintiff Sandra Feamster.
  3. Representatives and employees of Defendant Highmark West Virginia Inc. d/b/a Mountain State Blue Cross Blue Shield.
  4. Representatives and employees of Defendant Relational Management Services, LLC.

5. Representatives and employees of related entities.
6. The Plaintiffs reserve the right to supplement this disclosure with the names of additional persons having discoverable information as they become known to the Plaintiffs.

**(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:**

1. Plan documents provided by Defendants Highmark West Virginia Inc. d/b/a Mountain State Blue Cross Blue Shield and Relational Management Services, LLC.
2. CDs with payroll data produced by Defendant Relational Management Services, LLC.
3. File materials obtained in *Conn Feamster and Sandra Feamster v. Relational Management Services, LLC d/b/a Greenbrier Academy for Girls and Sharon Findlay*, Civil Action No. 09-C-55(R), Circuit Court of Greenbrier County, West Virginia.
4. The Plaintiffs reserve the right to supplement this initial disclosure with copies or descriptions of additional documents, data, compilations, and tangible things as they become known to the Plaintiffs.

**(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:**

1. Explanations of benefits, medical bills, and out of pocket expenses incurred by the Plaintiffs.

**(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable**

to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable to the Plaintiffs.

**CONN FEAMSTER AND  
SANDRA FEAMSTER  
By Counsel**

/s/ Jeffrey V. Mehalic  
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**CERTIFICATE OF SERVICE**

I, Jeffrey V. Mehalic, hereby certify that on this 30<sup>th</sup> day of July, 2010, I electronically filed the foregoing **PLAINTIFFS' RULE 26(a)(1) DISCLOSURES** with the Clerk of this Court using the CM/ECF system which will send notification of such filing to the following:

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